

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO
ALBUQUERQUE DIVISION**

GENERAL PROTECHT GROUP, INC., f/k/a
ZHEJIANG DONGZHENG ELECTRICAL,
CO.; G-TECHT GLOBAL CORPORATION;
SECURELECTRIC CORPORATION;
WAREHOUSE-LIGHTING.COM LLC;
CENTRAL PURCHASING, LLC; and
HARBOR FREIGHT TOOLS USA, INC.,

Plaintiffs,

v.

LEVITON MANUFACTURING CO., INC.,

Defendant.

Civ. No. 10-cv-01020-JB-LFG

**DECLARATION OF SHAUN SNADER IN SUPPORT OF LEVITON'S OPPOSITION TO
PLAINTIFFS' MOTION FOR FINDING OF EXCEPTIONAL CASE UNDER
35 U.S.C. § 285 AND AWARD OF ATTORNEYS' FEES AND MOTION TO TAX COSTS**

I, Shaun R. Snader, declare as follows:

1. I am an attorney with the law firm of Wilson Sonsini Goodrich & Rosati P.C., and I represent Defendant Leviton Manufacturing Co., Inc. ("Leviton") in the captioned litigation.
2. I make this declaration in support of Leviton's Opposition to Plaintiffs' Motion for Finding of Exceptional Case under 35 U.S.C. § 285 and Award of Attorneys' Fees and Motion to Tax Costs.
3. A true and correct copy of the Settlement Agreement between Leviton and Harbor Freight and Central Purchasing is attached as Exhibit 1.

4. A true and correct copy of the Notice from the International Trade Commission (“ITC”) in *In re Certain Ground Fault Circuit Interrupters and Products Containing Same*, Inv. No. 337-TA-739 regarding entry of a General Exclusion Order, among other things, is attached as Exhibit 2.

5. A true and correct copy of the Order from the United States Court of Appeals for the Federal Circuit (“Federal Circuit”) in connection with the appeal from the grant of a preliminary injunction in this case (“PI Appeal”) granting Appellant Leviton Manufacturing Co., Inc.’s motion to expedite, dated December 10, 2010, is attached as Exhibit 3.

6. A true and correct copy of correspondence from the Federal Circuit dated August 10, 2011, requesting that Plaintiffs’ file a response to Leviton’s petition for en banc review in connection with the PI Appeal is attached as Exhibit 4.

7. A true and correct copy of Order denying Leviton Manufacturing Co., Inc.’s petition for en banc review in connection with the PI Appeal, dated September 26, 2011, is attached as Exhibit 5.

8. A true and correct copy of the mandate issued from the Federal Circuit in connection with the PI Appeal is attached as Exhibit 6.

9. Annotated copies of Plaintiffs’ time records are attached as Exhibit 7. The first page of Exhibit 7 includes a summary of the fees that are improper, as explained in Leviton’s opposition memorandum.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 16th day of July, 2012, in Washington, DC.

A handwritten signature in blue ink, appearing to read "Shaun R. Snader", written over a horizontal line.

Shaun R. Snader